

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

RYAN PERRY, individually and on  
behalf of all others similarly situated,

*Plaintiff,*

v.

CABLE NEWS NETWORK, INC., a  
Delaware corporation; and CNN  
INTERACTIVE GROUP, INC., a  
Delaware corporation,

*Defendants*

Case No. 1:14-cv-2926-ELR

**MOTION FOR LEAVE TO WITHDRAW APPEARANCE OF  
J. DOMINICK LARRY**

J. Dominick Larry, one of the attorneys of record for Plaintiff Ryan Perry (“Plaintiff”), pursuant to Local Civil Rule 83.1, hereby respectfully moves the Court for leave to withdraw his appearance on behalf of Plaintiff. In support, Mr. Larry states as follows:

1. As of January 27, 2017, Mr. Larry is no longer associated with the law firm Edelson PC, which has been retained to represent Plaintiff in this matter. As such, Mr. Larry seeks leave to withdraw his appearance on behalf of Plaintiff.
2. Although Mr. Larry is no longer associated with Edelson PC, and will no longer represent Plaintiff in this action, Plaintiff will continue to be represented

by other attorneys at Edelson PC, including Jay Edelson, Rafey S. Balabanian, and Benjamin H. Richman. Therefore, Plaintiff will not be prejudiced by Mr. Larry's withdrawal.

3. On March 3, 2017, Mr. Larry provided Mr. Perry notice of his intent to withdraw as one of the counsel of record in this matter. Mr. Perry then fully consented to Mr. Larry's withdrawal. On April 7, 2017, no less than fourteen days prior to submitting this motion and pursuant to the Local Rules, Mr. Larry also provided written notice (the "Notice") to Plaintiff, by Federal Express, of his intention to withdraw as one of the counsel of record in this matter.

4. In the Notice, which is attached hereto as Exhibit A, provided Mr. Perry with the following information:

- a. That the Court retains jurisdiction of this action;
- b. That Mr. Perry has the burden of keeping the court informed respecting where notices, pleadings or other papers may be served;
- c. That Mr. Perry has the obligation to prepare for trial or hire other counsel to prepare for trial when the trial date has been set;
- d. If Mr. Perry fails or refuses to meet the above burdens, he may suffer adverse consequences;

- e. That no proceedings are scheduled before the Court, but holding of such proceedings will not be affected by the withdrawal of counsel; and
- f. That service of notices may be made upon Mr. Perry at his last known address.

WHEREFORE, Mr. Larry respectfully request that this Court enter an order granting him leave to withdraw his appearance as an attorney of record for Plaintiff Perry. A proposed order is attached hereto as Exhibit B for the Court's convenience.

Respectfully submitted,

**RYAN PERRY**, individually and on behalf  
of all others similarly situated,

Dated: April 6, 2017

By: /s/ Benjamin H. Richman

By: /s/ J. Dominick Larry

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**CERTIFICATE OF COMPLIANCE**

Pursuant to Local Rule 7.1(D), the undersigned counsel for Plaintiff certifies that the pleading has been prepared in Times New Roman, 14-point type, which is of the font selections approved by the Court in Local Rule 5.1(B).

/s/ Benjamin H. Richman \_\_\_\_\_

**CERTIFICATE OF SERVICE**

I hereby certify that on April 6, 2017, I electronically filed the above and foregoing with the Clerk of Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Benjamin H. Richman